

**FILED**

**SEP 15 2016**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA )

v. )

DANIEL CHAVEZ,  
SERAFIN VAZQUEZ,  
ERIC LOPEZ, and  
ALONZO VARGAS )

No. 16 CR 534

**JUDGE PALLMEYER**

Violations: Title 18, United States  
Code, Sections 922(g)(1) and  
924(c)(1)(A), and Title 21, United  
States Code, Section 841(a)(1)

**MAGISTRATE JUDGE VALDEZ**

**COUNT ONE**

The SPECIAL JULY 2016 GRAND JURY charges:

On or about August 19, 2016, at Berwyn, in the Northern District of Illinois,  
Eastern Division,

DANIEL CHAVEZ,  
SERAFIN VAZQUEZ, and  
ERIC LOPEZ,

defendants herein, knowingly and intentionally possessed with intent to distribute a  
controlled substance, namely, a quantity of a mixture and substance containing a  
detectable amount of cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO**

The SPECIAL JULY 2016 GRAND JURY further charges:

On or about August 19, 2016, at Berwyn, in the Northern District of Illinois,  
Eastern Division,

ERIC LOPEZ,

defendant herein, previously having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a loaded Sig Sauer Model P290RS pistol bearing serial number 26C011454, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**

The SPECIAL JULY 2016 GRAND JURY further charges:

On or about August 19, 2016, at Berwyn, in the Northern District of Illinois,  
Eastern Division,

ERIC LOPEZ,

defendant herein, did knowingly possess a firearm, namely, a loaded Sig Sauer Model P290RS pistol bearing serial number 26C011454, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 841(a)(1), as more fully set forth in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT FOUR**

The SPECIAL JULY 2016 GRAND JURY further charges:

On or about August 19, 2016, at Chicago in the Northern District of Illinois,  
Eastern Division,

ALONZO VARGAS,

defendant herein, did knowingly and intentionally distribute a controlled substance,  
namely, a quantity of a mixture and substance containing a detectable amount of  
cocaine, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,  
United States Code, Section 2.

**FORFEITURE ALLEGATION ONE**

The SPECIAL JULY 2016 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in this Indictment, defendant ERIC LOPEZ shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. The property to be forfeited includes, but is not limited to the following specific property: a light brown 2006 Buick sedan, VIN 1G4HD57226U128670, which was seized by law enforcement on or about August 19, 2016.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

**FORFEITURE ALLEGATION TWO**

The SPECIAL JULY 2016 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1) as set forth in this Indictment, defendant ERIC LOPEZ shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a)(2).

2. In addition, defendant shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. Section 3665.

3. The property to be forfeited includes, but is not limited to, a loaded Sig Sauer Model P290RS pistol bearing serial number 26C011454, and associated ammunition.

A TRUE BILL:

---

FOREPERSON

---

UNITED STATES ATTORNEY